

## **Janet Burcham Comment on Whiskey Dick Seasonal Road Closure**

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SUBJECT: DNS 13-082: WHISKEY DICK WILDLIFE AREA SEASONAL ROAD CLOSURE

Mr. Zeigler:

I am submitting these comments to the DNS 13-082: WHISKEY DICK WILDLIFE AREA SEASONAL ROAD CLOSURE.

My first comment is the calculated timing and extremely short public comment period for this predetermined "Determination of Nonsignificance". This SEPA was released during the Christmas holidays and spans only 2 weeks for public comment, covering not only Christmas but New Year's holidays. How convenient for the WDFW staff that wishes to prevent or limit public opposition to this negligent and rash proposal that will have adverse environmental impacts.

What is the rush to have a decision made on the continuation of the winter range closure before Feb. 1 when the closure can be continued as it has been done for the last 5 years until the "Naneum Ridge to Columbia River Recreation Plan" is completed in mid 2014? Could one reason be that numerous comments have already been received on the Recreation Plan supporting continued closure of all roads from Feb. 1 to April 30 in the winter range to motorized access? Organizations and groups such as Kittitas Audubon, Central Washington Native Plant Society, Wenatchee Sportsmen's Association, Black Hills Audubon, and numerous individuals have submitted comments to the public record supporting continuation of the winter range closure to motorized access. I speculate that this current proposal to change the status quo is purely a political decision. There is no compelling reason or justification given in the SEPA summary or Checklist to change the current closure management strategy. The evidence for a political rather than scientific reason is clear in the complete disregard of the science and facts supporting road closures during winter as described in the SEPA Checklist. They are as follows:

- 1) Research by WDFW field staff of the Colockum elk herd (2008-2012) that tracked movements of elk and their use of the winter range documented that elk became less sensitive to road proximity after motorized access was prohibited.
- 2) McCorquodale's published paper (2013) summarizes his and other researchers' work that open roads strongly affect elk distribution and negatively impact their energy reserves during a period of high environmental stress (winter). His summary of the Colockum Elk Study was that the data show that wintering elk in this region are in marginal physical condition in the mid-to-late winter period.
- 3) Implementation of the seasonal motorized vehicle restriction as part of a combination of management actions has resulted in a decrease of complaints from private landowners about damage by elk.

4) There will be continued and increased erosion on the very rough, primitive road if driving is allowed during the wet months of winter.

5) The results from a public opinion survey contracted by WDFW (2008) documented that an overwhelming majority of all types of hunters (74% to 84%) strongly support road closures to maintain healthy game populations during critical periods.

Opening the road through the winter range and down to the Gingko State Park will cause disturbance and harassment of elk, deer, and possibly bighorn sheep in direct contradiction to the purpose of the winter range.

In addition, this proposal requires another agency, Washington State Parks, to change its own management actions and policies regarding closed roads through Gingko State Park land. For WDFW to propose unilaterally what another agency must do to meet the needs of this proposed action is arrogant and inconsiderate. Washington State Parks is struggling to operate under severely reduced budgets. Gingko State Park has only one ranger to cover 3 parks during the winter period and no staff or resources for regular monitoring and enforcement to prevent theft and vandalizing of petrified wood and cultural resources or protect habitat. Closing or limiting access to the road through State Park lands only to private landowner(s) on the Columbia River is the best, and perhaps only, management option under current budget constraints.

According to the SEPA Checklist, proposed measures to reduce or control transportation impacts will necessitate increased enforcement presence. What is the likelihood of this happening? Where are the resources and staff at WDFW to do this monitoring at an effective level on a regular, continuous, and consistent basis? How many enforcement officers does WDFW have here, and what is the size of territory that each must now cover? Is the current or projected budget sufficient to cover this increased enforcement presence? There is no such monitoring now of the access beyond the voluntary closure sign, but it is known that this sign is ignored even now. None of these questions are addressed in the Checklist. Simply writing that there will be enforcement associated with this proposal to open a road continuously through the winter range to motorized access does not make it so. Increased monitoring and enforcement presence is even less likely for the Gingko State Park as described previously.

“Recreational driving” is new language and an added afterthought to informal recreational opportunities WDFW includes in the objectives for this and other wildlife areas. This has not been included as a form of recreational opportunity in the wording of WDFW’s mandate to maximize sustainable wildlife-related recreation until this proposal. For many, “recreational driving” takes the form of driving off-road creating deep ruts and deliberately “mudding” their vehicles. Or they drive off-road up steep slopes or across untracked meadows or fragile lithosol areas to test the virility of their vehicles. Do not pretend that “recreational driving” is a benign term and action with a universally understood interpretation. Do not assume that this destructive type of driving won’t happen on the winter range.

The winter range closure to motorized access is VERY SHORT, and will not result in any motorized user, including the Essmans, curling up and dying during those 3 months of closure. Nonmotorized access to the area is still permitted, including walking and horse riding. I support maintaining the closure to motorized access for the entire area of the winter range as has been done for the previous 5 years. It is even more important to continue the closure to motorized vehicles over the entire winter range now due to the recent fires in the Colockum-Tarps and Table Mountain areas that have reduced forage.

This proposal to alter the management of the winter range from complete closure to motorized access to allow one road through the middle of the winter range to be continuously open to motorized vehicles is inconsistent with the science that has been contracted by and conducted by WDFW. The proposed action of opening one road through the winter range and down to the Ginkgo State Park is not supported by the facts. There is no explanation or justification anywhere in the SEPA summary or Checklist that supports or provides a compelling rationale for opening the road through the middle of the winter range area to motorized traffic from Feb. 1 to April 30.

The "Determination of Nonsignificance" is contrary to the facts presented in the SEPA Checklist. Concluding a "determination of nonsignificance" through this SEPA process without a genuine review and consideration of facts as the SEPA process requires is a mockery. This SEPA must conclude a "Determination of Significant for Adverse Impact on the Environment".

I wonder why WDFW would spend so much time, effort, and money on research and implementation of management strategies that are based in sound science to simply override that with a political decision. Why would WDFW not support the efforts of the field staff that conducted that research and work hard to meet the mandates of the agency through best management practices? Why would WDFW be willing to alienate organizations and the public that support the agency's goals and mandate to make wildlife and habitat protection a priority for the benefit of current and future generations? The agency's credibility and future support are at risk with this proposal.

Sincerely,

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